

To Whom It May Concern:

In re:

PG&E Corporation
-and-
Pacific Gas and Electric Company,
as debtors and reorganized debtors.

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

Bankruptcy Case No. 19-30088 (DM)

Response to 44th Omnibus Objection.

Claim:

75943:

Dean Wills

\$1,559.54 : Medical Bills and Rental Car fees due to car accident.

12/1/2020

I oppose the Omnibus Objection. I oppose the disallowance and/or expungement due to "No Liability."

My claim occurred when I sustained injury while rear-ended in my car by an on-duty PG&E employee driving an official PG&E vehicle. This happened in Albany, California, far away from fires and not during any particular emergency or crisis.

PG&E instructed me to send them my reasonable bills and claims, and that these would be paid.

As such, PG&E has admitted liability already, and my claims for reimbursement of my Medical bills and rental-car fee while my car was being repaired are extremely reasonable.

I declare under penalty of perjury that these are the facts as I personally witnessed.



Dean Wills
(541) 829-2416
deancwills@mac.com
1234 Kains Ave.,
Berkeley, CA, 94706

Revision A: Contents Header Adjustment

1 KELLER BENVENUTTI KIM LLP
 2 Tobias S. Keller (#151445)
 3 (tkeller@kbkllp.com)
 4 Peter J. Benvenutti (#60566)
 5 (pbenvenutti@kbkllp.com)
 6 Jane Kim (#298192)
 7 (jkim@kbkllp.com)
 8 650 California Street, Suite 1900
 9 San Francisco, CA 94108
 Tel: 415 496 6723
 Fax: 650 636 9251

Attorneys for Debtors and Reorganized Debtors

THE OBJECTION DESCRIBED IN THIS NOTICE ASKS THE COURT TO DISALLOW AND/OR EXPUNGE YOUR CLAIM(S) IDENTIFIED AS "OBJECTED-TO" ON THE FOLLOWING PAGE OF THIS NOTICE.

CLAIMANTS RECEIVING THIS NOTICE SHOULD READ THIS NOTICE CAREFULLY BECAUSE THE OBJECTION MAY AFFECT YOUR RIGHT TO RECEIVE A DISTRIBUTION ON YOUR CLAIM IN THIS CASE.

IF YOU HAVE QUESTIONS, PLEASE CONTACT PRIME CLERK, LLC, AT (844) 339-4217

THE LAST PARAGRAPH OF THIS NOTICE EXPLAINS HOW YOU CAN OBTAIN A COMPLETE COPY OF THE OBJECTION, AT NO COST TO YOU.

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 14 **UNITED STATES BANKRUPTCY COURT**
 15 **NORTHERN DISTRICT OF CALIFORNIA**
 16 **SAN FRANCISCO DIVISION**

17 **In re:**

18 **PG&E CORPORATION,**

19 **- and -**

20 **PACIFIC GAS AND ELECTRIC**
 21 **COMPANY,**

Debtors.

- Affects PG&E Corporation
- Affects Pacific Gas and Electric Company
- Affects both Debtors

* All papers shall be filed in the Lead Case, No. 19-30088 (DM).

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

NOTICE OF THE REORGANIZED DEBTORS' FORTY-FOURTH OMNIBUS OBJECTION TO CLAIMS (NO LIABILITY / PASSTHROUGH CLAIMS)

Response Deadline:
December 1, 2020, 4:00 p.m. (PT)

Hearing Information If Timely Response Made:
 Date: December 15, 2020
 Time: 10:00 a.m. (Pacific Time)
 Place: (Telephonic Appearances Only)
 United States Bankruptcy Court
 Courtroom 17, 16th Floor
 San Francisco, CA 94102

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2 Creditor Name: Wills, Dean

Objected-To Claim(s)								
Claim/ Schedule to be Disallowed and Expunged	Debtor	Date Filed / Scheduled	Secured	Admin	Priority	General Unsecured	Total Amount	Basis for Objection
75943	Pacific Gas and Electric Company	10/21/2019	\$0.00	\$0.00	\$534.54	\$1,025.00	\$1,559.54	No Liability Claims

6 On November 5, 2020, PG&E Corporation and Pacific Gas and Electric Company, as debtors
7 and reorganized debtors (collectively, the “**Debtors**,” or as reorganized pursuant to the Plan, the
8 “**Reorganized Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”), filed
9 their *Forty-Fourth Omnibus Objection to Claims (No Liability / Passthrough Claims)* (the “**Omnibus
Objection**”) with the United States Bankruptcy Court for the Northern District of California (San
Francisco Division) (the “**Bankruptcy Court**”). A full copy of the Omnibus Objection may be
obtained at no cost, as provided below.

10 Any Response (as defined below) to the Omnibus Objection must be filed and
11 served upon the Reorganized Debtors’ Counsel by December 1, 2020 (the
“Response Deadline”);

12 Any Response must be accompanied by any declarations or memoranda of law any
13 responding party wishes to present in support of its position;

14 If there is no timely Response, the Bankruptcy Court may enter an order granting
15 the Omnibus Objection to your Proof(s) of Claim by default.

16 If you file a timely Response, the Hearing will be held at the date and time shown
17 below. If factual disputes are presented by the Objection and the Response, the
18 Hearing will proceed as a status conference; factual disputes will not be decided at
the Hearing, but at a future evidentiary hearing that may be set at the Hearing.
Issues of a purely legal nature, where facts are not in dispute, may be decided at
the Hearing. See Bankruptcy Local Rule 3007-1.

19 If you file and serve a timely Response, the date, location and time of the Hearing
20 are:

21 December 15, 2020 at 10:00 a.m. (Pacific Time)

22 Courtroom 17, 16th Floor, 450 Golden Gate Ave., San Francisco, CA

23 The Hearing will be held before the Honorable Dennis Montali, United States Bankruptcy
24 Judge. Pursuant to the Bankruptcy Court’s *Fourth Amended General Order No. 38 In re: Coronavirus
Disease Public Health Emergency, all hearings through March 1, 2021 will be held by video or
teleconference. The courtroom will be closed.* All parties who wish to appear at the Omnibus
25 Hearing must make arrangements to appear telephonically with CourtCall at 1-866-582-6878 no later
than 4:00 p.m. (Pacific Time) on the day before the Omnibus Hearing. Further information regarding
26 telephonic appearances via CourtCall can be found on the Bankruptcy Court’s website, at the
following location: www.canb.uscourts.gov > Rules and Procedures > District Procedures > Policy and
27 Procedure for Appearances by Telephone. Charges have been waived by CourtCall for pro se parties.

1 Reorganized Debtors' Counsel will, as a courtesy and on request, provide by email to those who have
2 filed timely Responses updated information regarding how to attend.

2 **These Omnibus Claims Objection Procedures DO NOT APPLY to any proofs of claim**
3 **with respect to (a) FIRE VICTIM CLAIMS or (b) SUBROGATION WILDFIRE CLAIMS.**

4 **BASIS FOR OBJECTION TO YOUR PROOF(S) OF CLAIM:** By the Omnibus
5 Objection, the Reorganized Debtors seek to disallow and/or expunge one or more of your Proof(s) of
6 Claim (as defined therein) listed above as "Objected-To Claim(s)" on the grounds that the designated
7 Proof(s) of Claim seek recovery of amounts for which the Debtors are not liable.

8 If you do **NOT** oppose the disallowance and/or expungement of your Objected-To Proof(s) of
9 Claim listed above, then you do **NOT** need to file a written Response to this Omnibus Objection and
10 you do **NOT** need to appear at the Hearing. If you do nothing, the Objected-To Claim(s) will be
11 disallowed and/or expunged.

12 **FILING AND SERVICE OF RESPONSE:** If you **DO** oppose the disallowance and/or
13 expungement of your Objected-To Proof(s) of Claim listed above, then you **MUST** file a response (a
14 "Response"), in writing, with the Bankruptcy Court, and serve it on the counsel for the Reorganized
15 Debtors at PGEclaims@kbkllp.com so as to be received by no later than **4:00 p.m. (Pacific Time) on**
16 **December 1, 2020 (the "Response Deadline")**: You must file the Response through the Court's
17 electronic case filing ("ECF") system if you have access to the ECF system; service on the
18 Reorganized Debtors' Counsel will occur automatically upon ECF filing; and no separate service of
19 your Response is required. If you do **NOT** have access to the ECF system, service must be made by
20 electronic mail to the Reorganized Debtors' counsel at PGEclaims@kbkllp.com, and you must arrange
21 for the Response to be filed with the Court within two business days thereafter. If you do not have the
22 ability to serve a Response electronically, the Response must be served by mail, express or some other
23 means so either (a) it is actually received by the Reorganized Debtors' Counsel by the Response
24 Deadline, or (b) it is dispatched not later than the Response Deadline through a postal or commercial
25 express service that will make actual delivery not more than two business days after the Response
26 Deadline, and in that case the Claimant must inform the Reorganized Debtors' counsel by email,
27 telephone or facsimile before the Response Deadline of the Claimant's name and phone number, the
28 number of the Omnibus Objection, and the fact that a paper Response is being delivered by express.

19 **CONTENTS OF RESPONSE** The Response must, at a minimum, include the following:
20 (i) a caption setting forth the name of the Bankruptcy Court, the name of the Reorganized Debtor, the
21 case number and title of the Omnibus Objection to which the Response is directed; (ii) your name, the
22 assigned number(s) of your Proof(s) of Claim, and an explanation for the amount of the Proof(s) of
23 Claim; (iii) a concise statement setting forth the reasons why the Bankruptcy Court should not sustain
24 the Omnibus Objection; (iv) a declaration under penalty of perjury of a person with personal
25 knowledge of the relevant facts that support the Response; (vi) your name, address, telephone number,
26 and/or the name, address, and telephone number of your attorney and/or designated representative to
27 whom counsel for the Reorganized Debtors should serve a reply to the Response, if any; and (vii) the
28 name, address, telephone number, and email address of the party with authority to reconcile, settle, or
otherwise resolve the Omnibus Objection on your behalf, if any.

25 If the Bankruptcy Court does not disallow and/or expunge your Objected-To Proof(s) of Claim
26 listed above, then the Reorganized Debtors have the right to object on other grounds to your Proof(s)
27 of Claim at a later date. You will receive a separate notice of any such objection.

1 **TO GET COPIES OF THE COMPLETE OBJECTION:** Copies of the complete Omnibus
2 Objection and the other pleadings and documents identified herein can be viewed and/or obtained:
3 (i) by accessing the Bankruptcy Court's website at <http://www.canb.uscourts.gov> [PACER account
4 required], (ii) for free by download from on the Reorganized Debtors' approved notice and claim
agent's website at <https://restructuring.primeclerk.com/pge/Home-DocketInfo>, or (iii) by mail, for free,
by calling Prime Clerk LLC at (844) 339-4217 (Toll Free) or by email at pgeinfo@primeclerk.com to
request a complete copy of the Omnibus Objection, including all Exhibits.

5 Dated: November 5, 2020

KELLER BENVENUTTI KIM LLP

6 */s/ Peter J. Benvenutti*

7 Peter J. Benvenutti

8 *Attorneys for Debtors and Reorganized Debtors*

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